

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Stephan M. Brown (SBN 300563) Daniel J. Griffin (SBN 311236) The Bankruptcy Group, P.C. 2408 Professional Drive Roseville, CA 95661 (800) 920-5351 (916) 242-8588 (fax) stephan@thebklawoffice.com daniel@thebklawoffice.com  <input type="checkbox"/> Debtor(s) appearing without an attorney <input checked="" type="checkbox"/> Attorney for: Creditor Scott Dain	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re: Martin Ramirez Troche and Maria Ramirez         Debtor(s).	CASE NO.: 2:22-bk-13031-JB CHAPTER: 11
	<b>NOTICE OF MOTION FOR ORDER WITHOUT A HEARING</b>  <b>[LBR 9013-1(p) or (q)]</b>
	[No hearing required]

**TO THE U.S. TRUSTEE AND ALL PARTIES ENTITLED TO NOTICE, PLEASE TAKE NOTICE THAT:**

1. Movant(s) creditor Scott Dain, c/o Law Offices of Anthony C. Duffy,  
filed a motion or application (Motion) entitled Motion for 2004 Examination - Debtor Martin Ramirez Troche.
2. Movant(s) requests that the court grant the motion without a hearing as provided for in:  
☒ LBR 9013-1(p), which, in addition to notice via Notice of Electronic Filing, requires the motion to be served on  
additional parties as specified in LBR 2004-1(c); or  
☐ LBR 9013-1(q), which requires service of the motion only on parties via Notice of Electronic Filing.
3. The motion is based upon the legal and factual grounds set forth in the motion. (*Check appropriate box below*):  
☒ The full motion is attached to this notice; or  
☐ The full motion was filed with the court as docket entry #     , and a detailed description of the relief sought is  
attached to this notice.

4. Movant will promptly lodge an order that the court may use to rule on the motion, as the court may rule on the motion without a hearing and without an opportunity for any party to file a request for a hearing,.

Respectfully submitted,

Date: 09/04/2022

/s/ Daniel Griffin

Signature of Movant or attorney for Movant

Daniel Griffin

Printed name of Movant or attorney for Movant

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
2408 Professional Drive, Roseville CA 95661

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR ORDER WITHOUT HEARING PURSUANT TO LBR 9013-1(p) or (q)** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 09/04/2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)* 09/04/2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** *(state method for each person or entity served)*: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

09/04/2022  
Date

Daniel Griffin  
Printed Name

/s/ Daniel Griffin  
Signature

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**SERVICE LIST**

**By NEF**

Robert Altagen (Debtors' attorney)  
robertaltagen@altagenlaw.com

Arturo Cisneros (TR)  
arturo@mclaw.org and amctrustee@mclaw.org

United States Trustee (LA)  
ustpreion16.la.ecf.usdoj.gov and dare.law@usdoj.gov

**By First-Class Mail**

Martin Ramirez Troche and Maria Ramirez (Debtors)  
4060 W. 134th St.  
Apt. A  
Hawthorne, CA 90250

THE BANKRUPTCY GROUP, P.C.